

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re**

**Motors Liquidation Company, et al.,**

## Debtors.

Chapter 11 Case No.  
09-50026 (REG)

(Jointly Administered)

**Barry N. Seidel**  
**Stefanie Birbrower Greer**  
**DICKSTEIN SHAPIRO LLP**  
**1633 Broadway**  
**New York, New York 10019-6708**

**NOTICE OF FILING**

Please take notice that on September 19, 2011 I have filed a Response of Clayton Coleman to 245<sup>th</sup> Omnibus Objection to Claims and Motion Requesting Enforcement of Bar Date Orders with the United States Bankruptcy Court Southern District of New York in the above-entitled cause, a copy of which is attached hereto and made a part of this Notice.

**Charles W. Pulliam, Attorney at Law**  
Attorney at Law  
931 E. 192<sup>nd</sup> Place Glenwood, IL 60425  
708/757-5642

## CERTIFICATION OF SERVICE

The undersigned, being an attorney licensed to practice law in the State of Illinois, certifies that a copy of the attached Response of Clayton Coleman to 245<sup>th</sup> Omnibus Objection to Claims and Motion Requesting Enforcement of Bar Date Orders was served upon the above-named parties by Regular Mail in Glenwood, IL on or before 4:00p.m., September 19, 2011.

**Charles W. Pulliam**  
Attorney at Law

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

Motors Liquidation Company, et al.,

Debtors.

)  
) Chapter 11 Case No.  
) 09-50026 (REG)

)  
) (Jointly Administered)  
)

**RESPONSE OF CLAYTON COLEMAN TO 245<sup>TH</sup> OMNIBUS OBJECTION TO  
CLAIMS AND MOTION REQUESTING ENFORCEMENT OF BAR DATE ORDERS**

TO THE HONORABLE ROBERT E. GERBER  
UNITED STATES BANKRUPTCY JUDGE:

Claimant Clayborn Coleman, by is attorney Charles W. Pulliam responds in opposition as follows to 245<sup>th</sup> Omnibus Objection to Claims and Motion Requesting Enforcement of Bar Date Orders:

1. Claimant Clayborn Coleman and his attorney Charles W. Pulliam are listed in Exhibit A, Page 7 of debtor's pleading.
2. Claimant believes that when all of the equities are considered that his claim was timely filed.
3. It would be unconscionable for a multi-billion dollar corporation such as debtors to be rewarded for confiscating claimant's investment as explained.
4. Claimant has submitted an affidavit which is attached to this response.
5. Claimant is legally competent and above the age of twenty one (21) years. If called as a witness, claimant could competently testify regarding the facts contained in this affidavit.

6. Claimant resides in Chicago, Cook County, Illinois.
7. Claimant's level of education is high school.
8. Claimant purchased the stock which is the subject of this action through, the debtor's agent, Ameritrade Gainskeeper.
9. Claimant attached to his Proof of Claim, the Ameritrade Symbol Transaction History.
10. Claimant can't recall receiving a timely notice to file a claim in this cause.
11. In addition to other purchases of the stock, Claimant made numerous purchases of the stock during 2010 up to and including January 20, 2011.
12. Paragraph 3 of Page 3 of debtor's Motion reads in part:
  - a. Representatives of the GUC Trust have examined the proofs of claim identified on **Exhibit "A"** and have determined that the proofs of claim listed (collectively, the "**Late-Filed Claims**") were received not only well after the Court-imposed deadlines as set forth in the applicable Bar Date Orders, but even After the Effective Date (March 31, 2011).
13. According to the above, claimant had approximately two months after he had last purchased debtor's stock, to retain an attorney and to file a claim.
14. Claimant is not a wealthy man and is a retired Machine Operator.
15. The debtor was and is a multi-billion dollar corporation with access to "high powered" lawyers.
16. The debtor or its offshoot is now highly profitable.

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17. The debtor should not be able to take advantage of claimant because of the great disparity in wealth.

Wherefore, Claimant requests that the debtor be ordered to pay the claim amount of \$20,000.00 to claimant.

Respectfully submitted,

Charles W. Pulliam

Charles W. Pulliam, 22619  
Attorney at Law  
931 E. 192<sup>nd</sup> Place  
Glenwood, IL 60425  
708/757-5642

STATE OF ILLNOIS

COUNTY OF COOK

**AFFIDAVIT OF CLAYTON COLEMAN**

Affiant, Clayborn Coleman first duly being sworn upon his oath deposes and states that:

1. He is legally competent and above the age of twenty one (21).years. If called as a witness, affiant could competently testify regarding the facts contained in this affidavit.
2. Affiant resides in Chicago, Cook County, Illinois.
3. Affiant's level of education is high school.
4. Affiant purchased the stock which is the subject of this action through, the debtor's agent, Ameritrade Gainskeeper.
5. Affiant attached to his Proof of Claim, the Ameritrade Symbol Transaction History.
6. Affiant can't recall receiving a timely notice to file a claim in this cause.
7. In addition to other purchases of the stock, affiant made numerous purchases of the stock during 2010 up to and including January 20, 2011.
8. Paragraph 3 of Page 3 of debtor's Motion reads in part:
  3. Representatives of the GUC Trust have examined the proofs of claim identified on **Exhibit "A"** and have determined that the proofs of claim listed (collectively, the **"Late-Filed Claims"**) were received not only well after the Court-imposed deadlines as set forth in the applicable Bar Date Orders, but even After the Effective Date (March 31, 2011).
9. According to the above, affiant had approximately two months after he had last purchased debtor's stock, to retain an attorney and to file a claim.
10. Affiant is not a wealthy man and is a retired Machine Operator.
11. The debtor was a multi-billion dollar corporation with access to "high powered" lawyers.
12. The debtor or its offshoot is now highly profitable.

13. The debtor should not be able to take advantage of affiant because of the great disparity in wealth.

14. Affiant requests that the debtor be ordered to pay the claim amount of \$20,000.00 to affiant.

Further, Affiant Sayeth Not!

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Clayton Clayborn

Subscribed and Sworn to  
Before me a Notary Public  
This 19 Day of September, 2011

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Notary Public

Charles W. Pulliam, 22619  
Attorney at Law  
931 E. 192<sup>nd</sup> Place  
Glenwood, IL 60425  
708/757-5642